

## SUMMARY

Michael A. Grassmueck  
The Grassmueck Group  
P.O. Box 5248  
Portland, OR 97281

January 15, 2016  
Bill No. 8167383  
Client/Matter: 2935565.000001

RCD

**Client: Grassmueck, Michael A.**  
**Matter: Path America Immigration Issues**

Current Professional Services Rendered	\$	27,704.50
Current Expenses	\$	25.34
TOTAL AMOUNT DUE	\$	<u>27,729.84</u>

## Exhibit A

ITEMIZED FEES

DATE	TKPR	DESCRIPTION	BILLED RATE	HOURS	AMOUNT
11/09/15	MCW	[SEC Receiver Document and Client Email Review]	240.00	7.00	1,680.00
11/10/15	MCW	[SEC Receiver Email Review]	240.00	4.00	960.00
11/18/15	RCD	Review initial documents; emails with Diana Carey	425.00	0.70	297.50
11/19/15	RCD	Review court documents and diagrams about expenditures and discuss immigration issues and options for Receiver with Diana Carey; conference with Yujing Sun about goals for filings	425.00	1.60	680.00
11/20/15	MCW	Review and reply to emails from Diana Carey regarding business plan and final versions	240.00	0.20	48.00
11/20/15	RCD	Prepare lengthy and detailed analysis of immigration related issues and options for Receiver concerning regional center, NCE/JCE, and investor eligibility for I-526 and I-829, including review of deal documents and government rules and policies, with numerous attachments (5.5); participate in extensive phone call with Receiver, Diana Carey, and investor representatives (2.0); review USCIS Notice of Intent to Terminate regional center designation of Path America SnoCo, LLC, prepare initial comments for Diana Carey about essential arguments to respond to same, and conference with Diana Carey about issues for response to NOIT (1.0)	425.00	8.50	3,612.50
11/21/15	RCD	Review news article comment forwarded by Diana Carey and comment about same	425.00	0.10	42.50

<u>DATE</u>	<u>TKPR</u>	<u>DESCRIPTION</u>	<u>BILLED RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/23/15	MCW	Review and analysis of business plans, case history, and revisions to plan; analysis with Robert Divine regarding follow up needed; analysis with Robert Divine and Kathleen Harrison regarding strategy for NOIT response and action needed; telephone conference with Michael Grassmueck, Diana Carey and team to discuss annual I-924A filings and follow up needed, EB-5 considerations	240.00	2.10	504.00
11/23/15	RCD	[Go through numerous emails identified by M. Walker for possible withholding and sort through which ones can be produced, which must be redacted, and which withheld, adding notes about each; coordinate with technology worker and General Counsel re same]	425.00	2.00	850.00
11/23/15	RCD	Respond to Diana Carey with response about differences in Business plans for Tower (per M. Walker); various emails with Diana Carey and Joshua del Castillo; coordinate efforts on I-924As; evening conference with Receiver legal team to discuss legal strategy to respond to USCIS NOIT and to preserve immigration options of investors and types of documents that accountants might be able to gather and validate, I-924A annual regional center report preparation, etc.	425.00	1.70	722.50
11/23/15	NEC	Team meeting to review status	160.00	0.20	32.00
11/24/15	MCW	Review and edit I-924A forms; analysis with Robert Divine regarding further edits and strategy; analysis with Robert Divine regarding I-829 preparation and follow up needed with Yujing Sun	240.00	1.60	384.00
11/24/15	RCD	Work with M. Walker on draft I-924 for Path America KingCo, LLC regional center; Review chart from Yujing Sun; conference with Yujing Sun about documents needed for I-829 and even I-526 petitions for both projects	425.00	1.50	637.50

<u>DATE</u>	<u>TKPR</u>	<u>DESCRIPTION</u>	<u>BILLED RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/24/15	RCD	[Final review and coordination concerning withholding and redaction of certain emails for Receiver from past Path America representation]	425.00	0.90	382.50
11/25/15	MCW	Review and edit I-924A materials for both regional centers; detailed emails to Diana Carey and team regarding further action and confirmation needed; review communications from Yujing Sun regarding I-829 preparation and follow up needed	240.00	1.60	384.00
11/25/15	RCD	Emails with Diana Carey and Yujing Sun about various matters; emails with M. Walker about I-924 and web site; review agreements with agents provided by Yujing Sun and prepare summary of essential terms and implications for Receiver team	425.00	2.20	935.00
11/27/15	RCD	Review comments from Kami Erickson about documents and comments from Yujing Sun about same; comment by email to team about implications of same and of accounting challenges	425.00	0.50	212.50
11/28/15	MCW	Review communications and revised I-924A with supporting materials from Yujing Sun in preparation for conference call	240.00	0.30	72.00
11/28/15	RCD	Review emails and prepare emails about documents about projects and about implications of regional center termination including possible legislative approach	425.00	1.00	425.00
11/30/15	MCW	Review materials and information gathered by Yujing Sun and Geg Gadawski in connection with I-924A filings and NOIT response; analysis with Robert Divine regarding annual report filing	240.00	1.30	312.00
11/30/15	RCD	Emails and calls with Diana Carey and M. Grassmueck about background, participants, roles, and documents (conference with Yujing and Kami put off until tomorrow); follow up	425.00	2.00	850.00

<u>DATE</u>	<u>TKPR</u>	<u>DESCRIPTION</u>	<u>BILLED RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/01/15	MCW	Review and compare I-924A figures with summarized list of issues in preparation for call; analysis with Robert Divine regarding follow up needed for I-829 and I-924A filings	240.00	1.10	264.00
12/01/15	RCD	Emails and conferences with Diana Carey re documents needed for EB(5) submissions for 924a filing and I-829 application	425.00	2.00	850.00
12/01/15	RCD	Review and respond to email of Dan Lundy, counsel for one or more investors, about possible lawsuit; forward such comments to M. Grassmueck and D. Carey	425.00	0.50	212.50
12/02/15	MCW	Review and organize I-829 materials; analysis with Robert Divine regarding document strategy and inquiries from outside parties; review and reply to emails from Yujing Sun regarding file management and most efficient structure for assembly of I-829 materials	240.00	1.10	264.00
12/02/15	RCD	Emails and conferences with M. Grassmueck and Diana Carey about strategy for approaching various possibilities to obtain extra equity investment in projects to meet the "sustain the investment" requirement for investors	425.00	2.00	850.00
12/02/15	RCD	Coordinate with M. Walker about managing Sharepoint site for I-829 documents; respond to D. Carey about land acquisition expenditure issues; responses to Ava Wang questions; briefly review and forward proposal from economist; briefly review and coordinate storage for corporate certificates; coordinate with M. Walker on further work on I-829s and I-924As	425.00	0.80	340.00
12/03/15	MCW	Review, organization, and coordination of I-829 materials; review communications from team to determine appropriate file management	240.00	0.90	216.00

<u>DATE</u>	<u>TKPR</u>	<u>DESCRIPTION</u>	<u>BILLED RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/03/15	RCD	Emails with D. Carey about receiver hiring economist; review and respond to inquiry by attorney Sarah Wang and Nelson Lee about upcoming I-829 petitions, etc.; review tasks; instruct Kami Erikson about accounting for expenditures; review inquiry from replacement regional center aspirant and forward to M. Grassmueck and D. Carey for consideration with background; respond to email questions of D. Carey, Yujing Sun, Kami Erikson, and G. Gadawski about receiver retaining staff for accounting for construction expenditures, etc.	425.00	1.30	552.50
12/04/15	MCW	Preparation and revisions of forms for I-924A and NOIT response documents; telephone conference with Michael Grassmueck and Diana Carey to discuss address and follow up issues	240.00	0.50	120.00
12/04/15	RCD	Study developing new legal proposal (only small portion of this time charged) and meet extensively with Ombudsman representative about workings of new law and importance of convincing USCIS and/or Congress to change policy toward investors whose regional center is terminated; coordinate closely with representatives in negotiations in congressional work on regional center law renewal and changes to educate them about importance of this issue and specific language to propose	425.00	3.00	1,275.00
12/04/15	RCD	Review voice mail from potential bidder to save project; forward same to Michael Grassmueck with introduction	425.00	0.10	42.50
12/05/15	RCD	Work through issues about sharing of files to receiver and prepare draft message explaining the mechanisms, parameters, and access; coordinate with IT staff	425.00	1.00	425.00

<u>DATE</u>	<u>TKPR</u>	<u>DESCRIPTION</u>	<u>BILLED RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/07/15	RCD	Work further with IT on organization and presentation of documents and emails for production to Receiver and continue to prepare introductory email to Receiver team about same	425.00	1.30	552.50
12/07/15	RCD	Review email from chinese migration agency in Dalian, China about status of Path America investments, etc.; conference with same agency who called; prepare email report to M. Grassmueck about such communications	425.00	0.80	340.00
12/08/15	RCD	Emails and conferences with Diana Carey and Michael Grassmueck and then with investors' counsels	425.00	2.00	850.00
12/09/15	RCD	Review and report to M. Grassmueck and D. Carey about progress in inserting into proposed legislation protections for investors whose regional centers are terminated	425.00	0.50	212.50
12/10/15	RCD	Emails with D. Carey and M. Grassmueck about messaging to investors and their representatives	425.00	0.20	85.00
12/10/15	RCD	Review and prepare detailed response to agent in China about developments and issues and coordinate broader message with Mr. Grassmueck	425.00	0.70	297.50
12/11/15	RCD	Review and prepare response to email of Celinka at Sunnyway (migration agency in China)	425.00	0.10	42.50
12/15/15	MCW	Revise KingCo I-924A form; emails to Yujing Sun to confirm updated information and missing data to complete I-924A filings for 2015	240.00	0.40	96.00
12/15/15	RCD	Emails with Diana Carey about messaging to investor interests and about immigration-based steps needed to help investors; notify C. Carey about status of EB-5 legislation (relating to forgiveness for investors with RC terminated)	425.00	0.50	212.50
12/16/15	MCW	Review and reply to emails from Yujng Sun regarding status of I-924A numbers and timing for submission	240.00	0.20	48.00

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12/16/15	RCD	Review and prepare response to email of Yujing Sun and Diana Carey about photos for I-829 package; respond to Yujing Sun about I-924 numbers re job creation	425.00	0.20	85.00
12/17/15	MCW	Review email communications from Greg Gadawski; analysis with Robert Divine regarding follow up needed	240.00	0.10	24.00
12/17/15	KRH	Analyze NOIT and correspondence regarding same; discuss strategy for response to NOIT with Robert Divine; draft response to NOIT	180.00	1.70	306.00
12/17/15	RCD	Review and comment on draft statement by Mr. Grassmueck to investors; work on improved draft communication piece to investors and their counsel concerning Receiver considerations and implications for immigration status; review Zaro revisions and comment on same; review USCIS NOIT and work with K. Harrison on response to USCIS notice of intent to terminate regional center; review and comments in emails with Greg Gadawski about I-924A numbers	425.00	2.50	1,062.50
12/18/15	MCW	Draft and revise filing letters and addenda for KingCo and SnoCo regional centers, review supporting documents, assembly of FY2015 I-924A and amended years for filing with USCIS; emails to team for final approval	240.00	1.80	432.00
12/18/15	KRH	Draft cover letter for response to NOIT; draft statement for Receiver to be included in response to NOIT	180.00	2.90	522.00
12/18/15	RCD	Work with K. Harrison on response to USCIS notice of intent to terminate regional center and send draft statement from receiver and attorney letter to client contacts for comment; arrange Receiver access to all Sharepoint sites for Path America along with other document sets and emails from past Path America representation	425.00	1.70	722.50



<b>DATE</b>	<b>TKPR</b>	<b>DESCRIPTION</b>	<b>BILLED RATE</b>	<b>HOURS</b>	<b>AMOUNT</b>
12/21/15	KRH	Emails regarding status of NOIT response	180.00	0.10	18.00
12/21/15	RCD	Review status on NOIT response due date; inquiry to Mr. Grassmueck about statement for NOIT response; review and approve Zaro change to cover letter; print same for filing	425.00	0.30	127.50
12/22/15	KRH	Finalize and file NOIT response package	180.00	1.30	234.00
12/22/15	RCD	Work with K. Harrison and M. Grassmueck to finalize response to USCIS Notice of Intent to Terminate SnoCo regional center	425.00	0.70	297.50
12/23/15	RCD	Review document for Chinese translation about role of receiver and status of efforts; prepare comments about same, particularly duplication, for D. Carey; follow up emails; send clients copy of response to USCIS NOIT filed yesterday	425.00	0.60	255.00
12/24/15	RCD	Coordinate with internal and client team about I-924A filings and signatures; review proposal from chinese investor for group to take over Farmers Market project and prepare detailed comments to client team about same and related considerations	425.00	1.00	425.00
12/26/15	RCD	Review and prepare response to email of David Zaro about capital infusion of loan vs. equity	425.00	0.10	42.50
12/28/15	KRH	Review and analyze NOIT; draft cover letter and receiver's statement for NOIT response; emails with Robert Divine and Diana Carey regarding NOIT response; emails with Robert Divine and Diana Carey regarding I-924A filings	180.00	1.90	342.00
12/28/15	RCD	Review new notice by USCIS to terminate the KingCo regional center relating to Tower and other projects, and begin work and instruct K. Harrison on further work to prepare response	425.00	0.50	212.50

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12/29/15	RCD	Review and prepare response to email of Sunnyway immigration agency about status of receivership; finalize I-924A filings for two regional centers and send to USCIS	425.00	1.00	425.00
TOTAL CURRENT FEES				80.40	\$ 27,704.50

**FEE RECAP**

<u>INITIALS</u>	<u>NAME</u>	<u>BILLED RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
KRH	K R Harrison	180.00	7.90	1,422.00
MCW	M C Walker	240.00	24.20	5,808.00
NEC	N E Collins	160.00	0.20	32.00
RCD	R C Divine	425.00	48.10	20,442.50
TOTAL CURRENT FEES				80.40 \$ 27,704.50

**ITEMIZED EXPENSES**

<u>DESCRIPTION</u>	<u>DATE</u>	<u>AMOUNT</u>
Delivery Services/Messengers VENDOR: FedEx INVOICE#: 526765320 DATE: 12/25/2015 Tracking Number: 775270449711	12/22/15	11.16
Delivery Services/Messengers VENDOR: FedEx INVOICE#: 527330316 DATE: 12/31/2015 Tracking Number: 775298989858	12/28/15	14.18
TOTAL CURRENT EXPENSES		\$ 25.34

TOTAL CURRENT AMOUNT DUE \$ 27,729.84

**BAKER  
DONELSON**  
BEARMAN, CALDWELL  
& BERKOWITZ, PC  
**TAX NO. 62-1047356**

1900 REPUBLIC CENTRE  
633 CHESTNUT STREET  
CHATTANOOGA, TENNESSEE 37450  
PHONE: 423.756.2010  
FAX: 423.756.3447

[www.bakerdonelson.com](http://www.bakerdonelson.com)

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## REMITTANCE

Michael A. Grassmueck  
The Grassmueck Group  
P.O. Box 5248  
Portland, OR 97281

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**Client: Grassmueck, Michael A.**  
**Matter: Path America Immigration Issues**

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Current Expenses	\$	25.34
TOTAL AMOUNT DUE	\$	<u>27,729.84</u>

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